

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	
)	Chapter 11
24 HOUR FITNESS WORLDWIDE, INC., <i>et</i>)	
<i>al.</i> ,)	Case No.: 20-11558 (KBO)
)	
Debtors.)	(Jointly Administered)
_____)	
)	
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Proc. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE)	
COMPANY; LIBERTY MUTUAL)	
INSURANCE COMPANY; BEAZLEY-)	
LLOYD'S SYNDICATES 2623/623; ALLIED)	
WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
_____)	

**CERTIFICATION OF COUNSEL SUBMITTING PROPOSED FORM OF ORDER
APPROVING THIRD AMENDED STIPULATED SCHEDULING ORDER**

I, Mark W. Eckard, hereby certify the following:

1. All parties have agreed on a form of *Third Amended Stipulated Scheduling Order*.
2. Attached hereto is a *[Proposed] Order Approving Third Amended Stipulation* (the "Proposed Form of Order").
3. The *Third Amended Stipulated Scheduling Order* in the form agreed to by all parties is attached as Exhibit A to the Proposed Form of Order.
4. Plaintiff respectfully requests that the Court enter the Proposed Form of Order as

an Order of the Court.

5. Undersigned counsel is available in the event that the Court has any concerns with respect to the foregoing.

Dated: April 28, 2022

Respectfully submitted,

REED SMITH LLP

By: /s/ Mark W. Eckard
Mark W. Eckard (No. 4542)
1201 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 778-7500
Facsimile: (302) 778-7575
Email: meckard@reedsmith.com

David E. Weiss (admitted *pro hac vice*)
T. Connor O'Carroll (admitted *pro hac vice*)
101 Second Street
Suite 1800
San Francisco, CA 94105-3659
Telephone: (415) 543-8700
Facsimile: (415) 391-8269
Email: dweiss@reedsmith.com
cocarroll@reedsmith.com

Counsel for Plaintiff 24 HOUR FITNESS
WORLDWIDE, INC.